

SCHWARTZ PERRY HELLER LLP

3 PARK AVENUE, 27<sup>TH</sup> FL. NEW YORK, NY 10016  
T: 212.889.6565 | F: 212.779.8208 | SPHLEGAL.COM

---

December 6, 2022

**VIA ECF**

Honorable Jennifer Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Fleur Sohtz v. Noogata Technologies, Inc. and Assaf Egozi***  
**Docket #: 22-CV-03608 (KPF)**

Dear Judge Rochon:

Our office represents the Plaintiff Fleur Sohtz in the matter referenced above. I write jointly with counsel for Defendants in accordance with Section 2(D) of Your Honor's Individual Rules in advance of the conference scheduled for December 15, 2022, to apprise the Court of the following, some of which was also contained in our joint status letter submitted on September 28, 2022:

**1. A brief statement of the nature of the case and/or the principal defenses thereto:**

Response: The nature of the case is disability discrimination, refusal to engage in a cooperative dialogue, failure to provide a reasonable accommodation and retaliation under the New York City Human Rights Law. Defendants deny any discrimination or retaliation against Plaintiff and submit that they engaged meaningfully in a cooperative dialogue.

**2. Any contemplated motions:**

Response: Plaintiff does not contemplate any motions, other than a discovery motion if that is required. Defendants may seek permission to move for summary judgment following discovery.

**3. The prospect of settlement:**

Response: The parties participated in a mediation through the Southern District of New York, but were unsuccessful in resolving this matter. At this stage, the parties do not believe further settlement discussions will be fruitful.

SCHWARTZ PERRY  HELLER LLP

Also filed with this letter is a proposed Case Management Plan.

Respectfully yours,



DAVIDA S. PERRY

DSP/arp

cc: Vincent Bauer, Esq. - Via ECF